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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

March 26, 2003

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Ms. Susan Roth
Roth Consulting
6236 27th Avenue NE
Seattle, WA 98115-7114

Dear Ms. Roth:

RE: Comments on the Draft Bridge Document Report 2 and Ongoing Site Investigation Direction: Terminal 91 Tank Farm Site Agreed Order No. DE 98HW-N108

The Draft Bridge Document Report 2 (BDR2) prepared for the Terminal 91 Site PLP Group (PLP Group) by Roth Consulting, was received by the Department of Ecology (Ecology) on February 3, 2003. This report addresses the portion of the Port of Seattle (POS) Terminal-91 facility where RCRA corrective action is being performed pursuant to the Model Toxics Control Act (MTCA) Agreed Order No. DE 98HW-N108.

Comments from Ecology are attached to this correspondence. The Draft BDR2 will need to be revised to satisfactorily address the comments, and resubmitted within sixty (60) days after you receive this correspondence. Some of the comments are not directed at specific passages in the BDR2, and may be more related to the ongoing groundwater remedial investigation, but are provided at this time so that Ecology can more clearly articulate our expectations for completing the RI/FS. Some of these groundwater investigation issues may be discussed during the upcoming meeting with the PLPs on March 28th, when the PLPs will present the major proposals included in your 3/31 work plan.

In addition, as an administrative update:

- Mike Kuntz, who has been working on the site for the last few years providing hydrogeological support, has been re-assigned by his program to work on other sites due to budgetary issues within the Agency. This will take effect by the end of March.
- Galen Tritt will be out of the office for the months of April and May, so in his absence the temporary site manager will be Ed Jones. He can be reached Monday, Tuesday, Thursday, and Friday at (425) 649-4449 or by email at ejon461@ecy.wa.gov .

Thank you for your submittal. If you have any questions or comments, or would like to schedule a meeting to resolve comments, please contact me at the Department of Ecology Northwest Regional Office by phone at (425) 649-7280 or by email at gtri461@ecy.wa.gov.

Sincerely,

Galen H. Tritt
Hazardous Waste and Toxics Reduction Program

GHT:sd

cc: Julie Sellick, Ecology-NWRO
Ed Jones, Ecology-NWRO
Michael Kuntz, Ecology-HQ-TCP
Jan Palumbo, EPA Region 10
HZW File 6.2

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   The reason it is helpful to keep these specific pathway linkages clear is that while detections of constituents in GW from 1998 on should be included on any *site* COPC list, they are unlikely to be the <u>only</u> COPCs we need to account for. For example, Ecology and the PLPs have the additional RI/FS task of assessing:
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The BDR1 and BDR2 COPC lists, therefore, may not include constituents that were present in GW prior to monitoring, and have subsequently entered surface water and contaminated sediments. This should be acknowledged in the report.

5. Page 7. While it is fairly obvious why newly detected constituents (in GW) should be added to the COPC list, it is less clear why it is appropriate to remove the 26 chemicals detected in the past, which have not been detected over the past two years. Ecology agrees that their "absence" implies that GW discharges no longer carry significant levels of these chemicals to surface water and sediments, but as noted above, their presence in samples historically suggests a concern for loading to sediments in the past. The PLPs should make it clear in the revised report what specific exposure/migration pathways will be assessed by the results obtained from GW monitoring using the presented analyte list.

6. Section 2.4.1 and the related figures. What is the most recent data from the "short fill" monitoring wells and how do the PLPs plan to incorporate this information into your overall site assessment? Can you address how this information is relevant (or show that it is not relevant) to the site investigation work?

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account for the lack of a pattern to concentrations along flow lines. If upgradient metals concentrations are relatively stable/steady state, though they are variable over distance perpendicular to flow lines, we should expect that downgradient concentrations should show the same patterns. Since this is not the case, a data gap for the RI seems to be to discover the cause of this site-wide variability[2]. As noted above, proposals for determining and using background concentrations of COPCs should either be included in the revised report or presented in a separate work plan.

11. Page 27. Here, the PLPs provide "Recommendations for Additional Work." Bullets 1, 3, 5, and 6 appear reasonable. Please revise this section to include information that addresses comments on the other bullets. It should be noted that:

a) It is not yet known whether well CP-103B is providing representative GW samples until it is replaced. Ecology's assumption for now is that it is. A new well should be located close to 103B's location.
b) The future RI/FS Report will focus on the site's COPCs, and narrow this list to the COCs that the FS must consider in evaluating potential remedies. It is worthwhile to continue screening exposure pathways to determine if the pathways are viable, and if they are, which COPCs could be responsible for unacceptable risk/harm. For the following exposure pathways, it appears to Ecology that the PLPs are making the noted progress:

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[2]Potential causes may include: non-stable/steady state concentrations upgradient (i.e., "pulsing"); on-site local sources; local geochemical conditions favoring more or less solubility/retardation; preferential GW pathways, or at least local variations in flow which our potentiometric surfaces have been insensitive to; etc.

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PLP response to Ecology Comment 2. Screening Levels-EDB,MTBE, N-hexane, VPH/EPH

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